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PROPOSED ATTORNEYS FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, <i>et al.</i> , ¹	§	Joint Administration Pending
	§	
Debtors.	§	Case No.:

**REQUEST FOR EMERGENCY
CONSIDERATION OF CERTAIN "FIRST DAY" MATTERS**

On April 30, 2015, ERG Intermediate Holdings, LLC.; ERG Resources, L.L.C.; West Cat Canyon, L.L.C.; ERG Interests, LLC; and ERG Operating Company, LLC (collectively, the "Debtors") each filed a petition for relief under Chapter 11 of the Bankruptcy Code. Counsel for the Debtors believes that these cases qualify as a "Complex Chapter 11 Case." The Debtors need emergency consideration of the following initial case matters (applicable items are checked):

 X JOINT MOTION FOR JOINT ADMINISTRATION

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (7946). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

- ☒ MOTION FOR ORDER EXTENDING TIME TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS
- ☒ MOTION RE MAINTENANCE OF BANK ACCOUNTS AND EXISTING CASH MANAGEMENT, ATTACHING NOTICE OF CONFERENCE WITH U.S. TRUSTEE
- ☒ MOTION TO PAY PRE-PETITION WAGES, SALARIES, ET AL., ATTACHING NOTICE OF CONFERENCE WITH U.S. TRUSTEE AND DETAILED EXHIBIT SHOWING WHO DEBTOR PROPOSES TO PAY AND AMOUNTS
- ☒ MOTION FOR ENTRY OF INTERIM ORDER AUTHORIZING USE OF CASH COLLATERAL
- ☒ MOTION FOR INTERIM APPROVAL OF POST-PETITION SECURED AND SUPER PRIORITY FINANCING PURSUANT TO SECTION 364(c) OF THE BANKRUPTCY CODE
- ☒ MOTION PURSUANT TO 11 U.S.C. § 366, FOR ENTRY OF INTERIM ORDER (1) DETERMINING ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE UTILITY SERVICES AND (2) RESTRAINING UTILITY COMPANIES FROM DISCONTINUING, ALTERING, OR REFUSING SERVICE
- ☐ MOTION TO ESTABLISH INTERIM NOTICE PROCEDURES
- ☐ MOTION FOR ORDER APPROVING INTERIM RETENTION OF PROFESSIONALS
- ☐ MOTION FOR ORDER APPROVING PAYMENT OF PRE-PETITION CLAIMS OF CERTAIN CRITICAL VENDORS
- ☒ MOTION OF THE DEBTORS FOR AN ORDER APPOINTING EPIQ BANKRUPTCY SOLUTIONS, LLC AS CLAIMS AND NOTICING AGENT UNDER SECTION 165(c)
- ☒ MOTION OF THE DEBTORS FOR AN ORDER (I) AUTHORIZING THEM TO HONOR OR PAY CERTAIN PREPETITION OBLIGATIONS TO THEIR CUSTOMERS AND (II) GRANTING CERTAIN RELATED RELIEF
- ☒ MOTION OF THE DEBTORS FOR AN ORDER AUTHORIZING THEM TO PAY CERTAIN PREPETITION OBLIGATIONS OF ROYALTIES, OVERRIDING ROYALTY INTERESTS, WORKING INTEREST OWNER PAYMENTS AND SEVERANCE TAXES

Dated: April 30, 2015
Dallas, Texas

Respectfully submitted,

/s/ Tom. A. Howley

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